

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND

MALIBU MEDIA, LLC,

Plaintiff,

v.

JOHN DOE,
Subscriber Assigned IP Address
108.31.28.249,

Defendant.

Civil Action No. TDC-15-3611

CERTIFICATION OF MALIBU MEDIA, LLC

Consistent with the Order entered on December 23, 2015, (the “Expedited Discovery Order”), Malibu Media, LLC (“Malibu”) hereby certifies as follows under penalty of perjury and in accordance with 28 U.S.C. § 1746 (2012):

1. Malibu understands that the Expedited Discovery Order sets forth conditions under which expedited discovery may be sought from the internet service provider (“ISP”) serving the Doe Defendant in this case (the “Conditions”);
2. Malibu further understands that the Conditions in the Expedited Discovery Order include, but are not limited to:
 - a. A requirement that any identifying Information obtained be maintained as “Highly Confidential” and not be disclosed except as expressly permitted in the Expedited Discovery Order; and
 - b. A prohibition on contacting an unrepresented Doe Defendant for the purposes of settlement;

3. Malibu understands that the Conditions are intrinsic to the grant of Malibu's motion for expedited discovery and do not depend upon the continued existence of a pending case; to the contrary, the Conditions remain in effect until and unless they expressly are removed or altered by this Court;
4. Malibu will continue to abide by the Conditions even if this case is terminated or dismissed, and will not disclose the Doe Defendant's information or attempt to contact an unrepresented Doe Defendant unless expressly authorized to do so by this Court; and
5. If Malibu brings any future actions against this Doe Defendant, or any party reasonably believed to be this Doe Defendant, in this or any other jurisdiction, it will ensure that a copy of the Expedited Discovery Order and this Certification are attached to the complaint or the first document filed after it becomes apparent that the defendant may be this Doe Defendant.

I certify the foregoing to be true under penalty of perjury.

Executed on this 28th day of December, 2015.

MALIBU MEDIA, LLC, by:

Christie Pelissier
Name: Christie Pelissier
Title: President